

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT

Conditional Major, Operating

Permit: F-08-021, Renewal

Adcom Wire Company

June 9, 2008

Vahid Bakhtiar, Reviewer

SOURCE ID: 21-113-00012

AGENCY INTEREST: 2275

ACTIVITY: APE20070001

SOURCE DESCRIPTION:

Adcom Wire Company in Nicholasville, Kentucky produces steel wire that is distributed both intra-company for bedspring manufacture and external outside sales. The facility produced 150,910 tons of cold drawn wire at the facility in 2006. The general production processes employed by Adcom Wire entail sulfuric acid pickling and cold drawing.

PERMIT RENEWAL F-08-021

Adcom Wire Company is currently operating under Conditional Major Permit No. F-03-010. Adcom Wire's application for renewal of the operating permit was received on Dec. 2007.

The Volatile Organic Compound (VOC) emissions from oil usage are negligible. According to MSDS sheet for the Conoco Hydroclear Industrial Oil 70, the VOC content is nil and VOC emissions are negligible from oil usage. So emissions point 02(9) has been removed from the existing permit.

Also insignificant activities Annealing Furnace (5 MMBtu/hr), and 2 Rod Bakers (1 MMBtu/hr each) were removed from Section C-Insignificant Activities of the existing permit.

COMMENTS:

Control Equipment:

Sulfuric acid emissions are controlled by a scrubber with 99% control efficiency.

Applicable Regulations:

Applicable regulations for this permit modification are

- i) Regulation 401 KAR 59:010 -New process operations
- ii) Regulation 401 KAR 63:010 – Fugitive Emission.

Affected state: None.

EMISSION AND OPERATING CAPS DESCRIPTION:

- i) 12-month rolling average of Particulate Matter (PM) shall not exceed 95 tons/yr (this includes sulfuric acid mist emissions), to preclude Major Source applicability.
- ii) Hourly particulate emission, as measured by Reference Method 5, Appendix A, 40 CFR 60, averaged over three hours shall not exceed 28.67 lbs/hr. [401 KAR 59:010, Section 3(2)].
- iii) Rod/wire usage shall not exceed 250,000 tons/yr.
- iv) Sulfuric acid makeup shall not exceed 3,099 tons/yr.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.